

UNITED STATES OF AMERICA
 STATE OF ILLINOIS, COUNTY OF MCHENRY
 IN THE CIRCUIT COURT OF THE TWENTY SECOND JUDICIAL CIRCUIT

COMPLAINT19CF290

CASE NUMBER

SAO NUMBER

DOCUMENT CONTROL NUMBER

CLPD-19-007922

REPORT NUMBER

CITY, VILLAGE, TOWNSHIP
AND CODEFILED
McHenry County, Illinois

APR 25 2019

KATHERINE M. KEEFE
Clerk of the Circuit Court

File Stamp Here

PEOPLE OF THE STATE OF ILLINOIS OR

A MUNICIPAL CORPORATION

-vs-

Andrew T Freund

DEFENDANT

COUNT ONE

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(1) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body, knowing said acts would cause the death of A.F., thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class M

COUNT TWO

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(2) of the Illinois Compiled Statutes in that said Defendant

without legal justification, forced A.F. (minor child, DOB 10/14/13), to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body, knowing that said acts created a strong probability of death or great bodily harm to A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class M

RIGHTS EXPLAINEDBY MEDATE 4/23/19

(VERIFICATION ON LAST PAGE)

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COUNT 3

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois Andrew T Freund _____ hereinafter called the defendant committed the offense of First Degree Murder _____ in violation of Chapter 720 Act 5 Section 9-1(a)(3) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, while committing or attempting to commit a forcible felony, Aggravated Battery in violation of Section 12-3.05(b)(1) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class M

COUNT 4

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois Andrew T Freund _____ hereinafter called the defendant committed the offense of First Degree Murder _____ in violation of Chapter 720 Act 5 Section 9-1(a)(3) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, while committing or attempting to commit a forcible felony, Aggravated Battery, in violation of Section 12-3.05(b)(2) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class M

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINED
BY AMG
DATE 1/25/19

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COUNT 5

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(3) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, while committing a forcible felony, Aggravated Domestic Battery, in violation of Section 12-3.3(a) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class M

COUNT 6

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of Aggravated Battery

in violation of Chapter 720 Act 5 Section 12-3.05(b)(1) of the Illinois Compiled Statutes in that said Defendant

in committing a battery, knowingly and without legal justification forced A.F. a minor child under 13 years of age (D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing great bodily harm in that it caused A.F.'s death.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class X

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINED

BY *MAP*

DATE *4/25/19*

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COUNT 7

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of Aggravated Domestic Battery _____

in violation of Chapter 720 Act 5 Section 12-3.3(a) of the Illinois Compiled Statutes in that said Defendant

in committing a domestic battery in violation of Section 12-3.2(a)(1) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, knowingly caused great bodily harm to A.F., (minor child, D.O.B. 10/14/2013), a family member of the defendant, in that said defendant forced A.F. to remain in a cold shower for an extended period of time and/or struck A.F. on or about the body causing A.F.'s death.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor

Class 2

COUNT 8

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of Aggravated Battery _____

in violation of Chapter 720 Act 5 Section 12-3.05(b)(2) of the Illinois Compiled Statutes in that said Defendant

in committing a battery, knowingly and without legal justification caused bodily harm to A.F., a minor child under 13 years of age (D.O.B. 10/14/2013) in that he forced A.F. to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor

Class 3

RIGHTS EXPLAINED

BY ME

DATE 4/23/19

(VERIFICATION ON LAST PAGE)

Jurisdiction Name/Code

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COUNT 9

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of Concealment Of Homicidal Death _____ in violation of Chapter 720 Act 5 Section 9-3.4(a) of the Illinois Compiled Statutes in that said Defendant

knowingly concealed the death of minor child A.F. (D.O.B. 10/14/2013) knowing that A.F. died by homicidal means in that he buried the body of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class 3

COUNT 10

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of Concealment Of Homicidal Death _____ in violation of Chapter 720 Act 5 Section 9-3.5(b) of the Illinois Compiled Statutes in that said Defendant

knowingly concealed the death of minor child A.F. (D.O.B. 10/14/2013) in that he buried the body of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class 4

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINED

BY ME

DATE 4/25/19

Jurisdiction Name/Code

Case Number

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Report Number

COUNT 11

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 17th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of Failure to Report Missing or Child Death _____ in violation of Chapter 720 Act 5 Section 10-10(a) of the Illinois Compiled Statutes in that said Defendant

the parent of A.F., a child under 13 years of age (D.O.B. 10/14/2013), failed to report the death of A.F. to law enforcement officers within 24 hours of death of A.F., when he knew A.F. to be deceased.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class 4

COUNT

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 24th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of _____ in violation of Chapter _____ Act _____ Section _____ of the Illinois Compiled Statutes in that said Defendant

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

Felony Misdemeanor Class _____

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINED

BY ME

DATE 4/25/19

19CF290

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CRIMINAL COMPLAINT
VERIFICATION

JURISDICTION NAME/CODE

I have read this complaint containing 11 count/s, and all allegations herein are true and correct. 4471

Detective Eitel

Complainant

Subscribed and sworn before me this
this 24 day of APRIL 2019 #4470

JUDGE/CIRCUIT COURT CLERK/NOTARY PUBLIC

DEPUTY OF THE CIRCUIT CLERK

Copy of Complaint delivered to said Defendant, rights explained and
Probable Cause found (if warrantless arrest)

Court Location:

A/O _____ Badge Number _____

TOTAL BOND \$ _____

this 25th day of April 2019 JUDGE

DEFENDANT INFORMATION:

DEFENDANT'S NAME - LAST	T	Andrew
Freund		
MIDDLE		FIRST

DEFENDANT'S ADDRESS	94 Dole Ave	Crystal Lake	IL	60014	815-219-6332
DATE OF BIRTH		CITY	STATE	ZIP CODE	TELEPHONE

DATE / TIME OF ARREST	12/19/1958	DRIVER'S LICENSE	F65301858360	STATE	IL
				STATE	

WARANTLESS ARREST Yes No Sex M Race WDATE / TIME OF ARREST 4/24/2019Co-Defendant(s): Yes No (Attach or identify to clerk)

RIGHTS EXPLAINED

BY MEDATE 4/25/19